

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

VANCE DOTSON,

Plaintiffs,

VS.

TRANSWORLD SYSTEMS, INC.,
And WORKS & LENTZ, INC., and
BULL CITY FINANCIAL
SOLUTIONS and HEALTHCARE
REVENUE RECOVERY GROUP,
LLC., d/b/a ARS ACCOUNT
RESOLUTION SERVICES.,

Defendants.

Case No. 5:22-cv-00029-D

DEFENDANT HEALTHCARE REVENUE RECOVERY GROUP, LLC'S
DISCLOSURE STATEMENT IDENTIFYING CONSTITUENTS OF LLC OR
PARTNERSHIP

Defendant Healthcare Revenue Recovery Group, LLC d/b/a ARS Account Resolution Services, by and through its undersigned counsel, files this Disclosure Statement Identifying Constituents of LLC or Partnership pursuant to LCvR7.1.1, and would respectfully show as follows:

1. Plaintiffs have not invoked federal jurisdiction in this case on the basis of diversity of citizenship with an LLC or partnership. Instead, Plaintiffs have invoked federal jurisdiction in this case on the basis of federal question pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1692k(d). [Doc. No. 11, p. 2, ¶ 2].

2. The full name of this Defendant is Healthcare Revenue Recovery Group, LLC (“HRRG”), who does business in Oklahoma as ARS Account Resolution Services.

3. HCFS Health Care Financial Services, LLC (“HCFS”) is the sole member of HRRG.
4. Neither HRRG nor HCFS is a publicly held corporation.
5. Neither HRRG nor HCFS is a governmental entity.

Dated: March 10, 2022.

Respectfully submitted,

/s/ Kevin T. Crocker

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Revenue Recovery Group, LLC d/b/a ARS
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CERTIFICATE OF SERVICE

This is to certify that on the 10th day of March 2022, a true and correct copy of the above and foregoing “*Defendant Healthcare Revenue Recovery Group, LLC’s Disclosure Statement Identifying Constituents of LLC or Partnership*” was served via the Court’s CM/ECF system and/or by e-mail transmission on: (i) Plaintiff, Vance Dotson, 425 W. Wilshire Blvd., Ste. E, Oklahoma City, Oklahoma 73116, e-mail: vancedotson@yahoo.com; (ii) Defendant Works & Lentz Inc., Ryan A. Ray, Esq. and W. Caleb Jones, Esq., Norman Wohlgemuth, Mid-Continent Tower, 401 S. Boston Ave., Suite 3200, Tulsa, Oklahoma 74103, (918) 586-2527 [Telephone], (918) 585-9447 [Facsimile], e-mails: RRay@NWLAWOK.com and Wjones@nwlawok.com, (iii) counsel for Bull City Financial Solutions, Eugene Xerxes Martin, IV, Esq., Malone Frost Martin PLLC, NorthPark Central, Suite 1850, 8750 North Central Expressway, Dallas, Texas 75231, (214) 346-2630 [Telephone], (214) 346-2631 [Facsimile], e-mail: xmartin@mamlaw.com.

/s/ Kevin T. Crocker

Kevin T. Crocker, Esq.